



### MSGP coverage

Margaret McCauley to: dbogaard

Cc: Chris Gebhardt

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From: Margaret McCauley/R10/USEPA/US  
To: dbogaard@idahotroutrout.com  
Cc: Chris Gebhardt/R10/USEPA/US@EPA

Thanks for your quick reply.

From our conversation, what I think might help is to go through these steps...

1. Determine, using your best professional judgment, whether or not there is a discharge of storm water (rain, snow melt) to waters of the U.S. If you determine that there is no potential to discharge storm water from your facility, then document how you have come to this conclusion. Keep it on file at your facility, in case EPA or other regulatory agencies may ask why your facility does not have MSGP coverage if/when they visit your facility for storm water or other inspections. If you think you might discharge storm water, then continue on to step 2:
2. Determine if all of your industrial processes are under cover and not exposed to storm water. If so, you may qualify for the Certificate of No Exposure:  
[http://www.epa.gov/npdes/pubs/msgp2008\\_appendixk.pdf](http://www.epa.gov/npdes/pubs/msgp2008_appendixk.pdf) If some of your processes are exposed to storm water continue to Step 3:
3. Read the 2008 MSGP, with special attention to the sector-specific requirements for your industrial activity/SIC Code (EPA calls it Sector U, food products)
4. Develop a Storm Water Pollution Prevention Plan (SWPPP). In this document, you will describe how you will...
  - a. comply with effluent limits,
  - b. conduct inspections,
  - c. conduct monitoring,
  - d. carry out corrective actions, and
  - e. conduct record keeping and submittal of the Annual Report
5. Complete the Endangered Species determination.
6. Complete the Historic Properties determination.
7. Submit and certify the Notice Of Intent (NOI).
8. Await confirmation from the EPA that the facility has MSGP coverage. Waiting period is 30 days.
9. Once confirmed, implement the SWPPP, including doing inspections, monitoring, recordkeeping, complying with effluent limits, etc.

Additionally, here are links to MSGP documents...

The 2008 MSGP Permit text - [http://www.epa.gov/npdes/pubs/msgp2008\\_finalpermit.pdf](http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf)  
The Fact Sheet for the 2008 MSGP - [http://www.epa.gov/npdes/pubs/msgp2008\\_finalfs.pdf](http://www.epa.gov/npdes/pubs/msgp2008_finalfs.pdf)  
Industrial Stormwater Monitoring and Sampling Guide -  
[http://www.epa.gov/npdes/pubs/msgp\\_monitoring\\_guide.pdf](http://www.epa.gov/npdes/pubs/msgp_monitoring_guide.pdf)  
Industrial Stormwater Pollution Prevention Plan (SWPPP) Guide -  
[http://www.epa.gov/npdes/pubs/industrial\\_swppp\\_guide.pdf](http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf)

Sample MSGP SWPPP Template -

[http://www.epa.gov/npdes/pubs/msgp2008\\_swppptemplate.doc](http://www.epa.gov/npdes/pubs/msgp2008_swppptemplate.doc)

Sample Recordkeeping Templates -

[http://www.epa.gov/npdes/pubs/msgp2008\\_recordkeepingtemplate.doc](http://www.epa.gov/npdes/pubs/msgp2008_recordkeepingtemplate.doc)

MSGP Industrial Discharge Monitoring Report (MDMR) Form -

<http://www.epa.gov/npdes/pubs/mdmr.pdf>

Annual Reporting Form - [http://www.epa.gov/npdes/pubs/msgp2008\\_appendixi.pdf](http://www.epa.gov/npdes/pubs/msgp2008_appendixi.pdf)

Region 10 Questions and Answers about the MSGP 2008 -

[http://yosemite.epa.gov/R10/water.nsf/989a02d6c3ced525882573fc0065b9a3/df0df90d683b419e882573590081496e/\\$FILE/MSGP%202008%20Region%2010%20Q&A%20%20-%20final.pdf](http://yosemite.epa.gov/R10/water.nsf/989a02d6c3ced525882573fc0065b9a3/df0df90d683b419e882573590081496e/$FILE/MSGP%202008%20Region%2010%20Q&A%20%20-%20final.pdf)

For additional compliance assistance, here is a fact sheet for the food products sector:

[http://www.epa.gov/npdes/pubs/sector\\_u\\_food.pdf](http://www.epa.gov/npdes/pubs/sector_u_food.pdf)

If you have any other questions, please let me know.

Sincerely,

Margaret McCauley

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<http://epa.gov/r10earth/waterpermits.htm>